

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	17-cr-64-DWF-KMM
)	
v.)	SUPPLEMENTAL
)	DECLARATION OF
EDWARD S. ADAMS,)	GLORIA K. MAIER
)	
Defendant.)	

Pursuant to 28 U.S.C. § 1746, I, Gloria K. Maier, hereby declare:

1. I am a United States citizen and I am over eighteen years of age. I am an associate attorney at Williams & Connolly LLP, and I am one of Mr. Adams's counsel of record in this matter.

2. Of the 3,350 Yahoo! documents that the government viewed and "seized" and over which Mr. Adams is not asserting any claim of privilege, at least 1,594 of them do not fall within the scope of the warrant, or do not fall within the scope of the probable cause established by Inspector Kroells's affidavit, or both. A list of these documents is attached hereto as Exhibit 1.

3. Of these 3,350 documents, 115 relate to Mr. Adams's personal matters, and are entirely unrelated to the issues described in either the superseding indictment or the warrant application. *See* Ex. 1 (list); Ex. 2 (documents).

4. Of the 3,350 documents, 635 relate to Mr. Adams's business interests other than Apollo and Scio, and are also entirely unrelated to the issues described in either the superseding indictment or in the warrant application. *See* Ex. 1 (list); Ex. 3 (documents).

5. Of the 3,350 documents, 556 relate to Apollo or Scio matters entirely unrelated to the issues described in either the superseding indictment or the warrant application. *See* Ex. 1 (list); Ex. 4 (documents).

6. Of the 3,350 documents, 249 relate to the sale of Apollo warrants and/or the allegedly secret bank accounts. *See* Ex. 1 (list); Ex. 5 (documents).

7. Of the 3,350 documents, 25 relate to Mr. Adams's personal tax returns or personal finances. *See* Ex. 1 (list); Ex. 6 (documents).

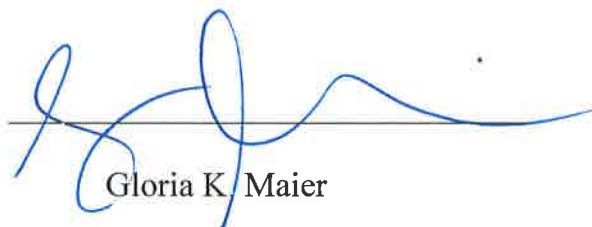
8. Of the 3,350 documents, 14 documents appear to be outside the scope of the warrant for other reasons. *See* Ex. 1 (list); Ex. 7 (documents).

9. Of the 22 documents printed by Inspector Kroells in March 2016, nearly all of these documents are outside the scope of the warrant. *See* Ex. 8 (Doc IDs 00268641, 00268642, 00270801, 00270833, 00270853, 00270894, 00271125, 00271605, 00271606, 00271878, 00271879, 00271883, 00271884, 00272070, 00272071, 00272080, 00280396, 00280488, 00280492, 00280683, 00282159, 00282160, 00282209, 00282211, 00289379, 00291027, 00292669, 00425265) (note, emails and attachments are listed separately).

10. The government showed witnesses *at least* 24 of the Yahoo! emails during the investigation, more than half of which are outside the scope of the warrant because they relate to the alleged embezzlement scheme, sale of Apollo warrants, alleged tax fraud scheme, or unrelated Apollo business. *See* Ex. 9 (24 documents attached to Jan. 5, 2018 AUSA Bildtsen emails, *see* Supp. Br. Ex. 14).

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 1st day of June, 2018.



Gloria K. Maier